

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**Hon. Gregory H. Woods**

Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

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IN RE APPLICATION OF MIHAIRS  
ULMANS FOR JUDICIAL ASSISTANCE  
PURSUANT TO 28 U.S.C. § 1782

**Case No 23-mc-00023 (GHW) (VF)**

*Submitted via post and e-mail*

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**OBJECTION  
TO THE APPLICATION OF MIHAIRS ULMANS FOR JUDICIAL ASSISTANCE**

On January 26, 2023, Mihails Ulmans, personal identification code 120653-11239 (hereinafter referred to as the “**Applicant**”), submitted an Application to the United States District Court Southern District of New York (hereinafter referred to as the “**Court**”) requesting the Court to grant the Application for Judicial Assistance and authorize Mr. Middlemiss to issue subpoenas *duces tecum* to correspondent banks located in the Southern District of New York seeking records that identify the details of international financial transactions involving Mr. Martins Bunkus.

On April 20, 2023, Magistrate Judge Mr. Valerie Figueredo granted Applicant's application pursuant to Section 1782 and vested Mr. Middlemiss with the authority to issue subpoenas to correspondent banks located in the Southern District of New York.

Hereby, we once again appeal to the institutions of the US judicial system, calling for increased attention to the suspicion of ongoing attempts to use the US judicial system to obstruct the prosecution of the charged in the murder case of attorney-at-law Martins Bunkus in the Republic of Latvia, using deliberately false and manipulative methods.

The Prosecutor's Office of the Republic of Latvia, in its comments on the details of the resolution of the murder case of attorney-at-law Martins Bunkus, has revealed to the public that the individuals involved in the murder of attorney-at-law Martins Bunkus acted as hardened criminals, not novices, whose way of life is the criminal world and its principles of operation, which are also involved in other murders, illegal weapons activities, and various other crimes typical of the world of organized crime.<sup>1</sup>

The individuals who have been charged with the murder of attorney-at-law Martins Bunkus have access to significant financial resources, **which they may be using to obstruct the investigation and trial proceedings of the Martins Bunkus murder case. There are reasons to believe that these individuals are manipulating information and documents to give the Court a false impression of the true motive behind the murder of attorney-at-law Martins Bunkus and the actual circumstances of the case.**

Therefore, we would like to draw your attention to the following:

On May 30, 2018, attorney-at-law Martins Bunkus, a public official and a person belonging to the judicial system of the Republic of Latvia, was murdered in a cold-blooded and brutal manner in a public place in the capital of the Republic of Latvia, Riga. On May 30, 2018, criminal proceedings No 11511001018 (hereinafter referred to as the "**Criminal Proceedings**") were initiated regarding the fact of the murder of attorney-at-law Martins Bunkus. In the Criminal Proceedings, we, the father of Martins Bunkus - Ojars Bunkus, and his brothers - Kaspars Bunkus and Kristaps Bunkus, have been recognized as victims (hereinafter all together referred to as the "**Victims**").

On May 24, 2022, the Main Criminal Police Department of the State Police of the Republic of Latvia announced the successful establishment of the chain of all persons involved in the murder of Martins Bunkus, from the person who ordered the murder to the organizer and the executor, after a four-year investigation. Mihails Ulmans was charged with ordering the murder of Martins Bunkus, while his long-time business partner, Aleksandrs Babenko, personal identification code 211261-11236, was charged with ordering and organizing the murder. On April 26, 2023, the case was transferred to the court of the Republic of Latvia for trial.

Since May 24, 2022, a defamation campaign has been launched against the Bunkus family, which is strongly suspected to have been ordered by the Applicant. We have applied to the law enforcement authorities of the Republic of Latvia with requests to investigate cases where we had strong reasons to believe that the Applicant's actions were aimed at obstructing the investigation and expected trial process of the Martins Bunkus murder case. However, there is reason to believe that the obstruction of the investigation into the murder of Martins Bunkus and the expected trial process has gained momentum. The Applicant, who is most likely aware of Martins Bunkus mother Dace Bunkusa's alleged

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<sup>1</sup> On December 8, 2022, a press conference was announced by the Prosecutor's Office of the Republic of Latvia. During the conference, Chief Prosecutor Armins Meisters of the Prosecutor's Office of the Riga District Court, Prosecutor Aldis Lasmanis, and the head of the Main Criminal Police Department of the Organized Crime Serious and Serial Crimes Department of the State Police of the Republic of Latvia Peteris Bauska, provided information about the current status of the murder case of attorney-at-law Martins Bunkus.

financial, psychological, and mental health problems, with help of his representatives may have obtained information and documents containing investigative secrets from her, and involved her in the possible attempts to obstruct the investigation and trial process of the Martins Bunkus murder case, possibly by offering her a financial reward.

In the addendum to the Court dated April 18, 2023 (hereinafter referred to as the “**Addendum**”), the Applicant's representatives refer to a submission by Martins Bunkus' mother, Dace Bunkusa (hereinafter referred to as the “**Submission**”), as evidence of the information provided by the Applicant to the Court.

It is important to note that the draft Submission attached to the Addendum, the date of which the Applicant most likely deliberately does not reveal to the Court (possibly by deleting it), was prepared around 2020 but no later than May 30, 2021. This means that it was created two years before the State Police of the Republic of Latvia completed the investigation of the Martins Bunkus murder case and announced the resolution of the case. Therefore, this Submission not only fails to reflect current information but also misleads the Court by ignoring the fact that the investigation into the murder of attorney-at-law Martins Bunkus has already taken place and been completed.

The Applicant's representatives did not reveal the actual date of the Submission, but it is evident that it was prepared around 2020 and no later than May 30, 2021. This is supported by the statement made by Dace Bunkusa in the Submission: "*Although more than two years have passed since the investigation began[...].*" Given that the investigation into the murder of Martins Bunkus began on May 30, 2018, it can be inferred that the Submission was prepared around 2020, but no later than May 30, 2021. However, the Applicant most likely is attempting to mislead the Court and manipulate the Submission by presenting it as reflecting current events in already completed investigation of the Martins Bunkus murder case, most likely by deliberately deleting the actual date of the Submission. Despite the fact that the Submission was prepared by Dace Bunkusa around 2020, which is two years before the murder case of Martins Bunkus was resolved, it is being presented as a new circumstance, apparently by manipulating it and not revealing (most likely deleting) its date.

Based on the information at our disposal, it appears that following the murder of Martins Bunkus, his mother, Dace Bunkusa, experienced severe mental, psychological, and financial difficulties. It is suspected that the Applicant is exploiting Dace Bunkusa's vulnerable state, either directly or indirectly through her so-called legal representative Ineta Malahovska, personal identification code 230563-10326, in exchange for a financial reward. It is believed that in such manner, the Applicant has involved Dace Bunkusa in their possible attempts to obstruct the investigation and trial of the Martins Bunkus murder case. This matter has already been reported to the law enforcement authorities of the Republic of Latvia.

It is unclear how the Applicant's representatives obtained the Submission. According to the Applicant's representatives, the Submission was obtained from their contact in Latvia (which is not revealed), and they do not have the original document at their disposal. Since the Submission is addressed to several institutions of the Republic of Latvia, it is unclear how the Applicant's representatives could have obtained this draft of the Submission if not through cooperation with Dace Bunkusa and/or her so-called legal representative Ineta Malahovska.

The aforementioned facts strongly suggest that the Applicant and his representatives are aware of the true date of the Submission and are intentionally providing false information to the Court by manipulating the evidence. This also reinforces the suspicion that the Applicant with help of his

representatives may have directly or indirectly involved Martins' mother, Dace Bunkusa, taking advantage of her mental, psychological, and financial state to obstruct the investigation and the trial of the Martins Bunkus murder case in the Republic of Latvia.

Furthermore, the content of the Submission suggests that it was addressed to **multiple institutions** in the Republic of Latvia. Since the Submission is dated no later than May 30, 2021, there is no reason to doubt that Latvian institutions had already evaluated and verified the information provided in it prior to the resolution of Martins Bunkus' murder case on May 24, 2022.

We have reason to believe that the Applicant is attempting to obstruct the investigation and expected trial of the Martins Bunkus murder case, and it is suspected that one of his methods used is by discrediting and questioning the work of law enforcement agencies in the Republic of Latvia. Despite the fact that two years have passed since the Submission, during which law enforcement authorities worked tirelessly to obtain evidence and examine all possible leads, resulting in the resolution of the Martins Bunkus murder case on May 24, 2022, aforementioned strongly suggests that the Applicant is using Dace Bunkusa's historic Submission to manipulate information and mislead the Court. This suggests that the Applicant is attempting to use the US judicial system to discredit and undermine the work of the law enforcement agencies in the Republic of Latvia.

Moreover, the Victims have previously submitted objections to the United States District Court District of Arizona, highlighting that attorney-at-law Janis Zelmenis provided false, incorrect, and misleading information to the court about the murdered attorney-at-law Martins Bunkus and other aspects of his professional activity. It is believed that it was done with the intention of giving the Applicant an opportunity to counteract and obstruct the investigation and subsequent trial process in the Republic of Latvia.

Based on the above, it can be concluded that the Applicant is most probably intentionally providing false information and manipulating evidence to obstruct the upcoming trial of the Martins Bunkus murder case in the Republic of Latvia, hoping to evade possible responsibility for the crime with which he has been charged with. There is also strong reason to believe that the Applicant is resorting even to cynical methods, such as exploiting Martins Bunkus' mother, Dace Bunkusa, by involving her in obstructing the investigation and the expected trial of the murder case of attorney-at-law Martins Bunkus, possibly by promising a financial reward for her support.

Therefore, the Victims strongly object the issuance of subpoenas in favour of the Applicant.

/Riga, May 4, 2023/

Respectfully,

*The Victims in the Criminal Proceedings of the murder case of attorney-at-law Martins Bunkus:*

Ojars Bunkus

Kaspars Bunkus

Kristaps Bunkus

*This document is signed with a secure electronic signature and contains a time stamp.*